

**MILMAN LABUDA LAW GROUP PLLC**  
3000 MARCUS AVENUE  
SUITE 3W8  
LAKE SUCCESS, NEW YORK 11042

TELEPHONE (516) 328-8899  
FACSIMILE (516) 328-0082

Author: Netanel Newberger- Partner  
Author's E-Mail Address: [netanelnewberger@mlaborlaw.com](mailto:netanelnewberger@mlaborlaw.com)  
Direct Dial: (516) 303-1356  
June 27, 2024

Via ECF

Honorable Dale E. Ho  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

The Court will enter the proposed protective order by separate order.

Given the discovery extension, the proposed default judgment order deadline is **ADJOURNED to October 8, 2024**. See ECF No. 36.

The Clerk of Court is respectfully directed to close ECF No. 26.

SO ORDERED.



**Hildreth Real Estate Advisors LLC v. Galvis et al.**  
**Docket No.: 1:23-cv-09372-(DEH)**  
**Our File No.: 146-2023**

Dale E. Ho  
United States District Judge  
Dated: June 28, 2024  
New York, New York

Dear Judge Ho:

This law firm represents plaintiff Hildreth Real Estate Advisors LLC (“Plaintiff”) in the above-referenced matter. We write pursuant to the Court’s June 26, 2024 Order, which granted Plaintiff’s letter-motion for a protective order, and directed Plaintiff to provide the Court with a copy of the Model Confidentiality Stipulation Order with Plaintiff’s proposed modifications in both clean version and redline, showing the differences between the Model and proposed protective order. Dkt. No. 50. A copy of the clean version and redline are attached hereto, respectively, as Exhibit “A” and “B”.

Additionally, in response to Plaintiff’s request to defer submission of the proposed default judgment order against defendant Fortitude Ventures III LLC until after completion of discovery, the Court’s May 16, 2024 Order rescheduled the deadline for submission of the proposed default judgment order to July 20, 2024. Dkt. No. 36. As such, Plaintiff respectfully requests clarification as to whether the July 20, 2024 deadline for submission of the proposed default judgment order will be adjourned until after completion of discovery on September 30, 2024. Dkt. No. 50.

Thank you for your attention to this matter.

Respectfully submitted,

**MILMAN LABUDA LAW GROUP, PLLC**

/s/

Netanel Newberger

Enclosures

cc: Felipe Galvis